

MEMO ENDORSED

THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

-----X
GENOA COLOR TECHNOLOGIES, LTD.,

Plaintiff,

v.

MITSUBISHI ELECTRIC CORP.;
MITSUBISHI ELECTRIC US HOLDINGS, INC.;
MITSUBISHI ELECTRIC AND
ELECTRONICS USA, INC.;
MITSUBISHI DIGITAL ELECTRONICS
AMERICA, INC.; SAMSUNG
ELECTRONICS CO., LTD.; SAMSUNG
ELECTRONICS AMERICA, INC.

Defendants.
-----X

*I have carefully
considered Genoa's
motion to reconsider
the order granting a stay.
Any grant of a
stay is
always
subject to
the*

Civil Action No. 07-CV-6233

(JURY TRIAL DEMANDED)

*revisitation in
event of undue
delay or efforts to
frustrate by the defendants to
obstruct the
inter partes
reexamination.*

**PLAINTIFFS' MOTION FOR RECONSIDERATION OF
ORDER GRANTING STAY PENDING INTER PARTES REEXAMINATION**

Genoa Color Technologies, Ltd. ("Genoa") respectfully requests that this Court reconsider its Order of June 20, 2008 granting a stay of this litigation pending resolution of the reexaminations that have been granted by the U.S. Patent and Trademark Office ("PTO").

The basis for this request is the very important study attached hereto entitled "Reexamining *Inter Partes* Reexam" by the Institute for Progress. See Exhibit A. Genoa was unaware of this study as of the hearing on June 20, and learned of it for the first time on June 26, 2008. The legitimacy of the study is evidenced by information regarding the Institute for Progress that is likewise attached. See Exhibit B.

The attached study speaks articulately for itself, and thus all of its findings need not be repeated here. Of particular importance, however, are the findings that:

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/24/08

*Upon
reconsideration,
the
stay will
remain in
place.*

*SO ORDERED
JSD
7-23-08*